

*Letter*

APR 18 1967

E. A. Rogers, M.D.  
Director of Health  
State Department of Health  
State House Station, B.x 94757  
Lincoln, Nebraska 68509

Dear Dr. Rogers:

This refers to the meeting of our respective staffs on March 28 and 29, 1967 to review the Nebraska regulatory program for the control of radiation. It is our practice to furnish each Agreement State, subsequent to our review meetings, with our comments and suggestions regarding that State's program. Based on our review, we believe the Nebraska program is being administered effectively. We are listing below a few suggestions that we hope may be found useful.

Our review of Nebraska license files indicated that, in general, the licensing actions taken were adequately supported by the information filed by the applicants. As our staff indicated during the meeting, we believe that a more complete protocol would have been useful in evaluating the use of americium 241 for human bone density measurements as authorized by License No. 01-01-01 issued to the University of Nebraska. The other licensing items, all minor, upon which we wished to comment were discussed during the meeting.

We reviewed several files of licensees who had been inspected and for which inspection reports had been prepared. Although they are prepared as a form report with the inspector's notes listed therein, the reports were comprehensive and were felt to be adequate to determine the status of the licensee's compliance with the regulations and his license and the adequacy of the licensee's operations to protect health and safety. We suggest, however, that additional detail be included in the reports on information obtained regarding (1) conditions found in unrestricted areas, and (2) the status of licensee survey records. Our discussions with your staff and our accompaniment on several inspections disclosed that the staff

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also in fact examine conditions in unrestricted areas and the licensee survey records and procedures. We believe such information is important in the event formal enforcement action needs to be taken and as a reference for future inspections and licensing actions. We also believe your enforcement letters should be more specific in describing certain items of non-compliance such as defining storage areas that were not properly posted or specifying dates when violations occurred.

We appreciate your prompt action in providing the opportunity for our Compliance Division inspector to accompany Health inspectors on several licensee inspections as suggested in your letter of February 7, 1967 to Mr. Willis, and we look forward to continuing this program in the future.

With regard to inspection procedures, we believe an expansion of the program for making independent surveys (including the collection of smear samples at facilities where significant quantities of radioactive material in loose forms are being used) during the inspections would be beneficial in cases where there may be a related violation of the regulations or if the licensee's survey program appears to be inadequate.

We are pleased to note that action is being taken to document and implement a radiological emergency plan. We trust that this project will be given priority since it will contribute to the total effectiveness of the State's radiological health program.

I hope that you will find the above comments and suggestions helpful. If you have any questions about them, please let us know.

Sincerely yours,

Robert R. Price, Director  
Division of State & Licensee  
Relations

cc: Miss G. Willis  
Mr. H. C. Paulus, COMB  
Mr. D. H. Walker, COMB

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